

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	No. 1:21-cr-00478-ER
v.	:	
	:	MOTION <i>IN LIMINE</i> TO
TREVOR MILTON,	:	EXCLUDE IRRELEVANT AND
	:	UNFAIRLY PREJUDICIAL
	:	EVIDENCE
Defendant.	:	
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Defendant Trevor Milton, through counsel and for the reasons stated in the accompanying Memorandum of Law, moves pursuant to Federal Rules of Evidence 401, 402, 403 and 404(b) to exclude any evidence of, and reference to, the following: (1) Mr. Milton’s disposition or voting of Nikola Corporation (“Nikola”) shares after the end of his lockup period in December 2020 and the price of Nikola shares after September 21, 2020; (2) Mr. Milton’s purported wealth, lifestyle or spending habits; and (3) the impact of the COVID-19 pandemic on so-called “retail investors” who may have faced financial and/or health challenges, and the effects of Mr. Milton’s alleged misstatements on those investors.

Dated: June 20, 2022

Respectfully submitted,

/s/ Bradley J. Bondi

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